

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	*	CHAPTER 13
MARVIN A. BROOKS	*	BANKRUPTCY NO. 19-15914
	*	
Debtor	*	

**ORDER**

AND NOW, this       day of       , 2023, upon  
consideration of Debtor's Objection to Certification of Default,  
it is hereby ORDERED and DECREED that;  
said Certification is DENIED

BY THE COURT:

\_\_\_\_\_  
J.

Kenneth G. Harrison, Esquire  
Five Neshaminy Interplex Suite 115  
Trevose, PA 19053

KML Law Group, P.C.  
701 Market Street  
Suite 5000  
Philadelphia, Pa 19106

Kenneth E. West, Esquire (Trustee)  
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Philadelphia, PA 19107

UNITED STATES BANKRUPTCY COURT  
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IN RE:	*	CHAPTER 13
MARVIN .A BROOKS	*	BANKRUPTCY NO. 19-15914
	*	
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**DEBTORS' OBJECTION TO CERTIFICATE OF DEFAULT**

Debtor, Marvin A. Brooks, by and through his attorney, Kenneth G. Harrison, Esquire, respectfully represents the following:

1. Mortgage company, Flagstar Bank, filed a Certification of Default concerning a Stipulation.

2. Mortgage company claims that Debtor did not pay all of the mortgage statements.

3. Debtor objects to the Certification of Default on the following grounds:

A. Debtor claims that he has made payments during the time period of alleged non-payment by the mortgage company.

WHEREFORE, Debtor respectfully requests that this Honorable Court dismiss this Certification of Default.

Respectfully submitted,

s/s Kenneth G. Harrison  
Kenneth G. Harrison, Esquire  
Five Neshaminy Interplex Suite 115  
Trevose, PA 19053